

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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GINTER LOGISTICS SERVICE CO, LTD,

Plaintiff,

-against-

ACH FREIGHT FORWARDING, INC., JIMIN ZHOU  
a/k/a JIMMY ZHOU, XIAO JI HE d/b/a PACIFIC JIN AN  
TRADING, INC. and XIN MAIO, INC.,

Defendants.

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Ginter Logistics Service Co, Ltd. ("Ginter"), by its attorneys, Dai & Associates,

P.C., based on information and belief, answers to Xiao Ji He d/b/a Pacific Jin An

Trading, Inc.'s counterclaim as follows:

1. Deny knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 49 of the counterclaim;
2. Deny knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 50 of the counterclaim;
3. Deny knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 51 of the counterclaim;
4. Deny knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 52 of the counterclaim.

WHEREFORE, Ginter respectfully requests a judgment

- 1) dismissing the counterclaim against Ginter;
- 2) denying all the relieves sought against Ginter;
- 3) granting Ginter legal fees and costs in this action; and
- 4) for such other and further relief as this court may deem just and proper.

Index No. 07 CIV 8677

**VERIFIED ANSWER TO  
XIAO JI HE D/B/A PACIFIC  
JIN AN TRADING, INC.'S  
COUNTERCLAIM**

Dated: Flushing, New York  
November 26, 2007

Dai & Associates, P.C.

**By:** /s/Yuan Zheng  
Yuan Zheng, Esq. (YZ1975)  
Attorneys for Plaintiff  
138-18 39<sup>th</sup> Ave, Suite 1102  
Flushing, New York 11354  
Tel: (718) 888-8880

CERTIFICATE OF SERVICE

I hereby certify that on this 26<sup>th</sup> day of November, 2007, the foregoing was filed electronically with the Clerk of Court to be served by operation of the Court's electronic filing system upon the registered participants for this action and was served via U.S. Mail by the United States Postal Service on the following non-participant in Electronic Case Filing:

Xin Maio, Inc. at 110-90 Dunkirk Street, 1<sup>st</sup> Floor, Jamaica, NY 11412.

/s/Yuan Zheng  
Yuan Zheng, Esq. (YZ1975)

**VERIFICATION**

YUAN ZHENG, an attorney duly admitted to practice law in the State of New York, hereby affirms the truth of the following under penalty of perjury and pursuant to CPLR §2106:

I am an associate of Dai & Associates, P.C., attorney for plaintiff Ginter Logistics Service Co., Ltd and I have read the contents of the foregoing answer and it is true to my knowledge, except as to the matters therein stated to be alleged on information and belief and that as to those matters I believe them to be true.

- ( X ) I make this verification because plaintiff resides outside of the county where Dai & Associates, P.C. maintains its office.
- ( X ) I make this verification because plaintiff is a corporation and Dai & Associates, P.C. is its attorney in this action and my knowledge is based upon all facts and corporation records available and in my possession.

Dated: Flushing, New York  
November 26, 2007

/s/Yuan Zheng  
YUAN ZHENG